

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

MELISA JENKINS,

Plaintiff,

v.

RAJIB GARU, *et al.*,

Defendants.

Case No. 1:25-cv-00449

Judge Jeffery P. Hopkins

Magistrate Judge Stephanie K. Bowman

**SECOND MOTION FOR AN EXTENSION  
OF TIME TO RESPOND TO  
DEFENDANTS' MOTION TO DISMISS  
EXTENDING DEADLINE FROM AUGUST  
14, 2025, TO SEPTEMBER 4, 2025.**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), on behalf of Plaintiff Melisa Jenkins, Counsel hereby respectfully moves this Court for a second extension of time to respond to Defendants' Motion to Dismiss (ECF No. 3) to allow for filing a memorandum in opposition pursuant to S.D. Ohio Civ. R. 7.2(a)(2) or by filing an amended complaint pursuant to Fed. R. Civ. P. 15(a). This Motion is being submitted for the Court's consideration prior to the expiration of time granted by the Court in response to Plaintiff's first motion for an extension of time (ECF No. 6).

The current deadline to respond to Defendants' Motion to Dismiss has been set by unopposed motion and Order from this Court to August 14, 2025. However, circumstances have changed, and an additional 21 days may be needed by Plaintiff to provide a response to the Court for the reasons set forth herein.

On behalf of Plaintiff, so as to avoid any harm to Plaintiff, Counsel requests an additional 21 days to respond to Defendants' Motion to Dismiss to avoid prejudice to the Plaintiff since the undersigned counsel has been discharged from representation. The additional 21 days will allow Plaintiff time to retain new counsel to oppose the Motion, if she so chooses to do so.

If the Court grants this requested extension, Plaintiff shall have through September 4, 2025,

to respond to Defendants' Motion by memorandum in opposition or by filing of an amended complaint.

This motion is filed contemporaneously with undersigned counsel's motion to withdraw as counsel for Plaintiff Melisa Jenkins. With the filing of this Motion, Plaintiff Melisa Jenkins has been informed of the filing of this Motion, of the current deadline in this case, and of the deadline being requested through this Motion.

Respectfully submitted,

/s/ John H. Phillips

James A. Hamilton (0102638)

John H. Phillips (0043934)

PHILLIPS LAW FIRM, INC.

9521 Montgomery Road

Cincinnati, OH 45242

(513) 985-2500

(513) 985-2503 fax

JAH@PhillipsLawFirm.com

JHP@PhillipsLawFirm.com

*Former Attorneys for Plaintiff Melisa Jenkins*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served on the following date, August 7, 2025, as follows:

☐ hand delivery,

☐ regular U.S. Mail, postage prepaid, to the addresses listed below

☐ facsimile to the fax number listed below

☒ email to the email address listed below

☒ through the United States District Court for the Southern District of Ohio's CM/ECF service to provide copies of filings to all parties and counsel entitled to receive service of documents in this case.

☐ other: \_\_\_\_\_

\_\_\_\_\_  
Anthony D. Maiorano, Esq.  
The CMW Law Firm  
14 E. Main St.  
Fairborn, OH 45324  
tony@cmwlawfirm.com  
*Attorney for Defendants Rajib Garu and  
Idealogiz Group, LLC*

Melisa Jenkins  
4457 Mellwood Avenue  
Cincinnati, OH 45232  
Telephone: 513-808-2044  
Email: sustenancedesigncincy@gmail.com

/s/ John H. Phillips  
John H. Phillips (0043934)  
*Former Attorney for Plaintiff Melisa Jenkins*